

CLIENT: The Taft Foley Law Firm
CASE DESCRIPTION: The Pierre Allen Matter
OUR FILE #: 08-01-0001
REPORT DATE: August 8, 2011
REPORT TOPIC: Interview Brenda Allen (Mother of Pierre Allen)
ATTACHMENTS: Sworn Affidavit

INVESTIGATIVE ACTIVITY

I. Preliminary Information

It has been requested that investigator William Hodge travel to San Antonio, Texas to interview and obtain a recorded and sworn statement from Brenda Allen. The attached statement is the results of those efforts.

II. Investigative Activity

On August 8, 2011, investigator William Hodge obtained the attached sworn statement from Brenda Allen at her residence located at 10807 Deepwater Bay Drive San Antonio, Texas 78251.

SWORN AFFIDAVIT

STATE OF TEXAS	§	KNOW ALL MEN BY
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COUNTY OF BEXAR	§	THESE PRESENTS

BEFORE ME, the undersigned authority in and for said County and State on this date personally appeared Brenda V. Allen who is known to me to be a credible person, and whom, after being duly sworn, upon his oath stated as follows:

My name is Brenda V. Allen. I was born on, April 3, 1960. My Texas identification driver's license number is [REDACTED]. I reside at 10807 Deepwater Bay Drive San Antonio, Texas 78251. My cell phone number is [REDACTED]. I have personal knowledge of the facts stated herein and they are true and correct:

I, Brenda Allen have information about a homicide that took place on or about August 4, 2011. At approximately 3:10 a.m., at 10802 Deepwater Bay Drive San Antonio, Texas 78251, regarding my son Pierre Allen.

On August 4, 2011, at about 3:10 a.m., I was awaked by my daughter Tiffany Allen. My daughter told me that the police were outside so I got out of bed and went downstairs to the front door. When I got to the front door I saw that the door was broken and the door's glass was all over the floor.

I went outside to see what was going on and saw the car that my son drives outside in the driveway. I saw about 8 police cars and never heard a police siren before (to wake me up) or after I came outside.

I heard Pierre call out to me "Ma Ma, help me", from behind some the vehicles in my neighbor's yard. I could not see Pierre due to my neighbor's vehicles and the fact that Pierre was surrounded by at least 6 to 8 San Antonio Police officers. Pierre was lying down on the ground and I could not see him. I was trying to get close to see what the police were doing to Pierre as he continued to call to me for help but at least 1 of the 5 police officers told me to get back.

I could hear the popping sounds of several tazer guns and Pierre screaming in agony. I saw the 3 or 4 police officer's fist striking at the area that Pierre was lying down. I could hear what sounded like the police officer's fist striking Pierre's body. I heard the police cheer each other on saying "Get some man, get some!" while they were hitting and tazing my son Pierre. Me, my son Lee Griffin and my daughter Tiffany Allen were all telling the police over and over again, "Don't taze him, he is high on crack, and that he is a paranoid schizophrenic.", but despite what I told them they continued to taze Pierre. I lost count of the number of times I

heard the tazer guns go off but I would have to say it was at least 10 times. I also saw a police dog in the area of where Pierre was laying down and another police officer with a dog arrived.

My neighbor Gary who lives at 10802 Deepwater Bay Drive San Antonio, Texas came outside and shouted to the police, "He's down, you don't have to do him like that!"

The beating of Pierre went for about 15 minutes before it stopped. I was really worried when Pierre stopped calling me for help and at that time I already knew for myself that he was dead.

After about another 15 minutes I finally heard my first siren although other police cars continued to arrive on my street. The siren was an ambulance. I thought that Pierre was finally going to get looked at but when the paramedics got out of the truck they went to look at a police officer's hand who apparently injured his hand from hitting Pierre. That injured officer, whose name I do not know, approached me right before the ambulance arrived and asked me was Pierre high or something. I told the officer that I told you guys that he was but yall tazed him anyway.

After the police officers were looked at the paramedics looked at Pierre last. I never saw the police attempt to give aid to Pierre but after the paramedics got there they started to do chest compressions. After a few minutes they put him into an ambulance but they did not leave.

The ambulance continued to stay on my street for about 20 more minutes while the ambulance that the police were sitting in already left. I attempted to ask the police officer's supervisor, Anderson what Pierre's condition was. Anderson stated "I don't know what his condition is. I got police officer's at Christus Santa Rosa. I will send someone over there to find out what is going on. Right now I got police officer's hurt."

A few minutes passed by and Supervisor Anderson came back over to me. I told him that I wanted to see Pierre. Anderson told me "If you know how to act I will let you see your son" I told Anderson that I know how to conduct myself. He led me to the ambulance and I saw the paramedics pumping on Pierre's chest. I saw Pierre's eyes. They looked to be bulged out of their eye sockets. I felt that the paramedics were "putting on a show" for me because I felt that Pierre was dead.

Police officers were outside bragging to each other where they tazed and hit Pierre. They were saying things like "Man, I got him over there and over there and over there." They were laughing and joking around with each other like they had a good time.

I came to find out that Pierre was dead through talking to one of the detectives that was in yard collecting evidence. I asked him and he told me that Pierre did not make it. He told me this about 20 minutes after the ambulance left my street.

